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12 Attorneys for Plaintiffs/Counterdefendants

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,
 ALLSTATE PROPERTY & CASUALTY
 17 INSURANCE COMPANY, ALLSTATE
 INDEMNITY COMPANY, and ALLSTATE
 18 FIRE & CASUALTY INSURANCE
 COMPANY,

19 Plaintiffs,

20 v.

21 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
 MD, RUSSELL J. SHAH, MD, LTD., DIPTI
 22 R. SHAH, MD, LTD., and RADAR
 MEDICAL GROUP, LLP dba UNIVERSITY
 23 URGENT CARE, DOES 1-100, and ROES
 24 101-200,

25 Defendants.

26 AND RELATED CLAIMS
 27
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CASE NO. 2:15-cv-01786-APG-CWH

STIPULATION TO INCLUDE MOSS
 BERG INJURY LAWYERS INTO THE
 STIPULATED CONFIDENTIALITY AND
 PROTECTIVE ORDER (ECF NO. 39)
 FOR THE DISCLOSURE OF
 DOCUMENTS PURSUANT TO F.R.C.P.
 45 SUBPOENA

STIPULATION TO INCLUDE LAW FIRM INTO THE STIPULATED CONFIDENTIALITY AND
 PROTECTIVE ORDER (ECF NO. 39)

2:15-cv-01786-APG-CWH

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 the law firm of MOSS BERG INJURY LAWYERS (non-party herein after referred to as "MBIL")
5 hereby stipulate and agree as follows:

6 1. Plaintiffs served MBIL with a subpoena pursuant to F.R.C.P. 45 for the production of
7 documents regarding communications and payments made by and between Law Firm and the
8 Defendants during MBIL's representation of certain clients in personal injury claims for which
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. MBIL provided a written objection to the Rule 45 subpoena.

11 3. MBIL is aware that Plaintiffs have subpoenaed several law firms seeking the same type
12 of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*
13 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH* ("*Belsky*").

14 4. MBIL understands that this Court presides over both the instant matter as well as the
15 *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law
16 firms to produce the same type of documents request of MBIL.

17 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs
18 and Defendants for the disclosure of confidential, sensitive or other protected information was
19 approved by this Court on May 20, 2016. (ECF No. 39).

20 6. MBIL was not a party to the stipulated confidentiality and protective order. (ECF No.
21 39).

22 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
23 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

24 8. In accordance with this Court's prior rulings both in this action and in the *Belsky*
25 matter, the parties hereby stipulate and agree that the protections and scope articulated in the
26 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.
27 39) be extended in their entirety to cover MBIL in its compliance with Plaintiffs' subpoena.

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1 9. MBIL will produce all documents responsive to the subpoena within ten (10) days of
2 approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 1/4/19

Dated:

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

MOSS BERG INJURY LAWYERS

7 By: 

By: 

8 DYLAN P. TODD, ESQ.

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11 Attorneys for Plaintiffs/Counterdefendants

Boyd Moss, Esq.

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4101 Meadows Ln., #110

Las Vegas, NV 89147

702-222-4555

12 ORDER

13 IT IS SO ORDERED.

14 DATED this 14 day of January, 2019.

15 
16 UNITED STATES MAGISTRATE JUDGE
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